

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

IN RE: Richard S Erb  
Heidi Brennan-Erb  
Debtor(s)

CHAPTER 13  
CASE NO. 17-60676

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Freedom Mortgage Corporation

Movant

v.

Richard S Erb  
Heidi Brennan-Erb  
Respondent(s)

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

Comes now the Debtor, by counsel and answers the movants' motion as follows:

1. Debtor(s) admit the allegations contained in paragraphs 1, 2, 3, 4, 5, 6, 7, 10 and 11 of the movants' motion.
2. Debtor(s) does not admit or deny allegations in paragraph 8 and 9 as debtor(s) allege that payments have been made as of date of filing this answer and a current pay history has not been received.
3. Debtors deny the allegations contained in paragraph 12 of the movants' motion and demands strict proof thereof.

Wherefore the Debtor(s), moves that the motion to lift stay be denied, that the Movant provide strict proof of the delinquency claims.

Dated: 04/05/2021

Richard S Erb  
Heidi Brennan-Erb  
By: /s/ Stephen E. Dunn, Esq.

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CERTIFICATE OF SERVICE

I certify that a copy of the preceding answer has been served via ECF to attorney for the creditor on this *5th day of April, 2021*.

/s/ Stephen E. Dunn, Esq.